

EXHIBIT 1
(Reply Declaration of M. Joseph Stith)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554**

In the Matter of)

AT&T Corp.)

Petition for Rulemaking To Reform)
Regulation Of Incumbent Local Exchange)
Carrier Rates For Interstate Special)
Access Services)
_____)

RM 10593

REPLY DECLARATION OF M. JOSEPH STITH

1. My name is M. Joseph Stith. I am the same Joseph Stith that submitted a declaration with AT&T's Petition for Rulemaking.
2. I have prepared the attached charts, which provide an updated comparison of each Bell company's tariffed interstate special access rates subject to price caps with their tariffed interstate rates subject to pricing flexibility in each state. The charts also provide a comparison of those rates to the rates for comparable unbundled network elements in each state.
3. I computed the rates as follows. All rates are for a ten-mile stand-alone circuit, to facilitate apples-to-apples comparisons. In other words, each rate is for two channel terminations, a fixed mileage charge for transport, and per-mile charge for transport (multiplied by ten). In any instance in which the ILEC has zoned rates, I used the Zone

1 rate for price capped areas and the first noted zone/band rate for Phase II pricing flexibility areas. All rates are as of December 1, 2002.

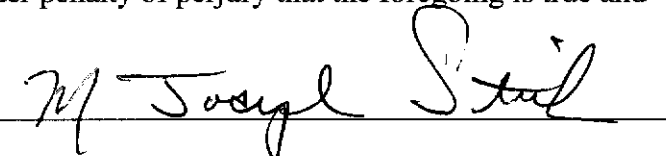
4. The most significant differences involve Qwest, because Qwest increased its rates for DS1 service in November (shortly after AT&T filed its Petition). At the time of my original declaration, Qwest's DS1 rates in Phase II areas were 5% higher than its rates in price capped areas; the difference is now 20%.
5. The rate categories used in the charts are as follows: "ILEC Tariff" is the ILEC's tariffed month-to-month rate for a ten-mile standalone circuit for special access services still subject to price caps.
6. "ILEC OPP" is the ILEC's tariffed rate for a ten-mile standalone circuit provided in its optional pricing plan ("OPP"), for services still subject to price caps. All OPP rates are for five-year plans, except where not available, in which case the highest year plan below five years was used.¹
7. "ILEC Pricing Flex Tariff" is the ILEC's tariffed month-to-month rate for a ten-mile standalone circuit for special access services no longer subject to price caps.
8. "ILEC Pricing Flex OPP" is the ILEC's tariffed rate for a ten-mile standalone circuit provided in its OPP for services no longer subject to price caps. Again, all OPP rates

¹ "ILEC OPP" does not include payment plans requiring commitment either to an expense level or to a level of expense growth.

are five-year plans, except where not available, in which case the highest year plan below five years was used.¹

9. "Month-to-Month Difference Pricing Flex to Price Cap" is the percentage difference between the price capped month-to-month rate and the pricing flexibility month-to-month rate (*i.e.*, the percentage difference between the rates in columns 1 and 3).
10. "OPP % Difference Pricing Flex to Price Cap" is the percentage difference between the price capped OPP rate and the pricing flexibility OPP rate (*i.e.*, the percentage difference between the rates in columns 2 and 4).
11. "UNE rate" is the rate for a loop and transport combination in that state, assuming a ten-mile circuit. The chart displays UNE rates only where such rates are ordered and effective as determined by a state commission.
12. Finally, in their comments, the Bells quote AT&T's Chairman, David Dorman, as saying that AT&T provides 20% of its overall T1 equivalents over its own facilities. *See, e.g.*, SBC Comments at 14. What is important to understand is that most of those T1 equivalents are provided as OCn services. By contrast, 93% of AT&T's total T1 equivalents provided as DS1 services are provided by the incumbent LECs, and 65% of AT&T's total T1 equivalents provided as DS3 services are provided by the incumbents. DS1 and DS3 services also represent a far larger portion of AT&T's overall T1 equivalents than OCn services, and 65% of AT&T's access expense is used to purchase DS1 and DS3 services.

I, M. Joseph Stith, declare under penalty of perjury that the foregoing is true and correct.


M. Joseph Stith

Executed on January 22, 2003.

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State

BellSouth Alabama

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$505	\$380	\$601	\$391	19%	3%	\$220
DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,485
DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$64
DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$64
OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A

BellSouth Georgia

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$505	\$380	\$601	\$391	19%	3%	\$177
DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,737
DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$54
DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$54
OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A

BellSouth Florida

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$505	\$380	\$601	\$391	19%	3%	\$198
DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$2,070
DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$61
DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$61
OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A

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Comparison of costs (10-mile Standalone Circuit)

Company	State	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Can	OPP % Difference Pricing Flex to Price Can	UNE rate
BellSouth	North Carolina	DS1	\$505	\$380	\$601	\$391	19%	3%	\$176
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,772
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$61
		DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$61
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
		OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
		OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A
BellSouth	South Carolina	DS1	\$505	\$380	\$601	\$391	19%	3%	\$183
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	Local Ch N/A
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$63
		DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$63
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
		OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
		OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A
BellSouth	Mississippi	DS1	\$505	\$380	\$601	\$391	19%	3%	\$169
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,450
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$59
		DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$59
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
		OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
		OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A

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Comparison of costs (10-mile Standalone Circuit)

Company	State	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
BellSouth	Louisiana	DS1	\$505	\$380	\$601	\$391	19%	3%	\$224
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,760
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$75
		DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$75
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	
		OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	
BellSouth	Tennessee	OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	
		ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
		DS1	\$505	\$380	\$601	\$391	19%	3%	\$175
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$1,918
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$61
		DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$61
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
BellSouth	Kentucky	OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
		OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A
		ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
		DS1	\$505	\$380	\$601	\$391	19%	3%	\$191
		DS3	\$7,210	\$4,075	\$8,180	\$4,575	13%	12%	\$2,127
		DS-0 Digital	\$284	\$202	\$284	\$202	0%	0%	\$70
BellSouth	Kentucky	DS-0 Analog	\$151	\$110	\$151	\$110	0%	0%	\$70
		OC-3	\$11,630	\$9,520	\$11,980	\$9,600	3%	1%	N/A
		OC-12	\$23,990	\$19,810	\$24,440	\$19,450	2%	-2%	N/A
		OC-48	\$50,000	\$40,500	\$50,200	\$38,600	0%	-5%	N/A
		OC-192	\$129,500	\$104,100	\$129,500	\$95,700	0%	-8%	N/A

- Notes:
- DS3 assumed POP channel term and the end-user channel term are between 1/2 and 1 mile of their LEC serving wire centers.
 - OC-n not offered at month-to-month rates, used 1-year term plan for Tariff pricing. Mileage is offered at month-to-month rates, but continued to use 1-year term plan.
 - Used OC-n 4-wire for interface rates.
 - OC-n assumed both channel terms within 1/2 mi. of their respective LSOs.
 - OC-192 did not have interface rates in the tariff, used 4 times the OC-48 rates.
 - DS1, DS0-Digital and DS0-Analog used 49-month OPPs. DS3 used 61-month.
 - DS3: Assumed a 1-mile end-user and POP channel term.
 - Did not include the TSP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates, but not to UNE rates.
 - Did not include Pricing Flexibility contracts that require a committed level of access expense.

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Comparison of costs (10-mile Standalone Circuit)

Company State

Qwest Arizona

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$420	\$326	\$506	\$393	21%	20%	\$371
DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	\$4,376
DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
OC-3					N/A	N/A	N/A
OC-12					N/A	N/A	N/A
OC-48					N/A	N/A	N/A
OC-192					N/A	N/A	N/A

Qwest Colorado

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$420	\$326	\$506	\$393	21%	20%	\$153
DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	\$1,131
DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
OC-3					N/A	N/A	N/A
OC-12					N/A	N/A	N/A
OC-48					N/A	N/A	N/A
OC-192					N/A	N/A	N/A

Qwest Iowa

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$420	\$326	\$506	\$393	21%	20%	Loop N/A
DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop N/A
DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
OC-3					N/A	N/A	N/A
OC-12					N/A	N/A	N/A
OC-48					N/A	N/A	N/A
OC-192					N/A	N/A	N/A

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Comparison of costs (10-mile Standalone Circuit)

Company	State	Qwest	Idaho	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
Qwest	Idaho			DS1	\$440	\$342	\$529	\$411	20%	20%	Loop & Mi N/A
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
				DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
				OC-3					N/A	N/A	N/A
Qwest	Minnesota			OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
				OC-192					N/A	N/A	N/A
				DS1	\$420	\$326	\$506	\$393	21%	20%	Loop N/A
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop N/A
Qwest	Montana			DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
				OC-3					N/A	N/A	N/A
				OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
Qwest	Montana			OC-192					N/A	N/A	N/A
				DS1	\$440	\$342	\$529	\$411	20%	20%	Loop & Mi N/A
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
				DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
Qwest	Montana			OC-3					N/A	N/A	N/A
				OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
				OC-192					N/A	N/A	N/A

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Comparison of costs (10-mile Standalone Circuit)

Company	State	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
Qwest	North Dakota	DS1	\$440	\$342	\$529	\$411	20%	20%	Loop & Mi N/A
		DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
		DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
		DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
		OC-3					N/A	N/A	N/A
Qwest	Nebraska	OC-12					N/A	N/A	N/A
		OC-48					N/A	N/A	N/A
		OC-192					N/A	N/A	N/A
		ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
		DS1	\$420	\$326	\$506	\$393	21%	20%	\$227
Qwest	New Mexico	DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	\$1,677
		DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
		DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
		OC-3					N/A	N/A	N/A
		OC-12					N/A	N/A	N/A
Qwest	New Mexico	OC-48					N/A	N/A	N/A
		OC-192					N/A	N/A	N/A
		ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
		DS1	\$420	\$326	\$506	\$393	21%	20%	Loop & Mi N/A
		DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
Qwest	New Mexico	DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
		DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
		OC-3					N/A	N/A	N/A
		OC-12					N/A	N/A	N/A
		OC-48					N/A	N/A	N/A
Qwest	New Mexico	OC-192					N/A	N/A	N/A

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Comparison of costs (10-mile Standalone Circuit)

Company	State	Qwest	Oregon	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
				DS1	\$420	\$326	\$506	\$393	21%	20%	\$221
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	\$1,082
				DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
				OC-3					N/A	N/A	N/A
				OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
				OC-192					N/A	N/A	N/A

Company	State	Qwest	South Dakota	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
				DS1	\$440	\$342	\$529	\$411	20%	20%	Loop & Mi N/A
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
				DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
				OC-3					N/A	N/A	N/A
				OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
				OC-192					N/A	N/A	N/A

Company	State	Qwest	Utah	ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
				DS1	\$420	\$326	\$506	\$393	21%	20%	Loop & Mi N/A
				DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
				DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
				DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
				OC-3					N/A	N/A	N/A
				OC-12					N/A	N/A	N/A
				OC-48					N/A	N/A	N/A
				OC-192					N/A	N/A	N/A

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State

Qwest Washington

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$420	\$326	\$506	\$393	21%	20%	Loop & Mi N/A
DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Mileage N/A
DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Mileage N/A
OC-3					N/A	N/A	N/A
OC-12					N/A	N/A	N/A
OC-48					N/A	N/A	N/A
OC-192					N/A	N/A	N/A

Qwest Wyoming

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$440	\$342	\$529	\$411	20%	20%	Loop & Mi N/A
DS3	\$3,710	\$2,783	\$3,710	\$2,783	0%	0%	Loop & Mi N/A
DS-0 Digital	\$175	\$140	\$197	\$158	12%	12%	Loop & Mi N/A
DS-0 Analog	\$87	\$79	\$179	\$179	105%	125%	Loop & Mi N/A
OC-3					N/A	N/A	N/A
OC-12					N/A	N/A	N/A
OC-48					N/A	N/A	N/A
OC-192					N/A	N/A	N/A

1 DS3: Assumed a 1-mile end-user and POP channel term.

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State

SBCAmeritech Illinois

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$974	\$346	\$974	\$371	0%	7%	\$201
DS3	\$9,460	\$2,480	\$9,460	\$2,736	0%	10%	\$1,966
DS-0 Digital	\$250	\$141	\$268	\$158	7%	12%	Mileage N/A
DS-0 Analog	\$90	\$67	\$112	\$92	24%	37%	Mileage N/A
OC-3	\$7,788	\$5,050	\$7,788	\$5,000	0%	-1%	N/A
OC-12	\$16,848	\$8,520	\$16,848	\$10,720	0%	26%	N/A
OC-48	\$28,846	\$16,000	\$28,846	\$17,180	0%	7%	N/A
OC-192	\$79,370	\$46,040	\$79,370	\$46,040	0%	0%	N/A

SBCAmeritech Indiana

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$1,025	\$373	\$1,025	\$392	0%	5%	\$142
DS3	\$9,750	\$2,580	\$9,750	\$2,830	0%	10%	\$1,790
DS-0 Digital	\$250	\$141	\$268	\$158	7%	12%	Loop & Mi N/A
DS-0 Analog	\$90	\$67	\$112	\$92	24%	37%	Loop & Mi N/A
OC-3	\$7,788	\$5,050	\$7,788	\$5,000	0%	-1%	N/A
OC-12	\$16,848	\$8,520	\$16,848	\$10,720	0%	26%	N/A
OC-48	\$28,846	\$16,000	\$28,846	\$17,180	0%	7%	N/A
OC-192	\$79,370	\$46,040	\$79,370	\$46,040	0%	0%	N/A

SBCAmeritech Michigan

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$1,002	\$361	\$1,002	\$382	0%	6%	\$94
DS3	\$9,610	\$2,530	\$9,610	\$2,793	0%	10%	\$962
DS-0 Digital	\$250	\$141	\$268	\$158	7%	12%	Mileage N/A
DS-0 Analog	\$90	\$67	\$112	\$92	24%	37%	Mileage N/A
OC-3	\$7,788	\$5,050	\$7,788	\$5,000	0%	-1%	N/A
OC-12	\$16,848	\$8,520	\$16,848	\$10,720	0%	26%	N/A
OC-48	\$28,846	\$16,000	\$28,846	\$17,180	0%	7%	N/A
OC-192	\$79,370	\$46,040	\$79,370	\$46,040	0%	0%	N/A

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State

SBC:Ameritech Ohio

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$1,002	\$361	\$1,002	\$382	0%	6%	\$184
DS3	\$9,610	\$2,530	\$9,610	\$2,793	0%	10%	\$1,888
DS-0 Digital	\$250	\$141	\$268	\$158	7%	12%	Mileage N/A
DS-0 Analog	\$90	\$67	\$112	\$92	24%	37%	Mileage N/A
OC-3	\$7,788	\$5,050	\$7,788	\$5,000	0%	-1%	N/A
OC-12	\$16,848	\$8,520	\$16,848	\$10,720	0%	26%	N/A
OC-48	\$28,846	\$16,000	\$28,846	\$17,180	0%	7%	N/A
OC-192	\$79,370	\$46,040	\$79,370	\$46,040	0%	0%	N/A

SBC:Ameritech Wisconsin

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$1,025	\$373	\$1,025	\$392	0%	5%	\$190
DS3	\$9,750	\$2,580	\$9,750	\$2,830	0%	10%	\$2,316
DS-0 Digital	\$250	\$141	\$268	\$158	7%	12%	Mileage N/A
DS-0 Analog	\$90	\$67	\$112	\$92	24%	37%	Mileage N/A
OC-3	\$7,788	\$5,050	\$7,788	\$5,000	0%	-1%	N/A
OC-12	\$16,848	\$8,520	\$16,848	\$10,720	0%	26%	N/A
OC-48	\$28,846	\$16,000	\$28,846	\$17,180	0%	7%	N/A
OC-192	\$79,370	\$46,040	\$79,370	\$46,040	0%	0%	N/A

Notes:

- Fixed mileage rates in the tariff were doubled as they are in ABC: Ameritech's billing.
- OC-n must be purchased as an OPP, when the OPP expires, monthly extension rates are charged. The Tariff prices used these monthly extension rates.
- DS0-Digital, used Base Rate prices.
- Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates, but not to UNE rates.

1/16/2003

Company State

SBC: Pac Bell California

Comparison of costs (10-mile Standalone Circuit)

<i>ILEC</i>	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$398	\$275	\$411	\$340	3%	24%	\$231
DS3	\$5,680	\$2,480	\$5,810	\$2,750	2%	11% Loop	N/A
DS-0 Digital	\$155	\$155	\$194	\$194	25%	25%	\$73
DS-0 Analog	\$75	\$75	\$86	\$86	15%	15%	\$73
OC-3	\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48	\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

1 Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates, but not to UNE rates.

2 Did not include the DVP Optional Payment Plan that requires a committed level of total DS1 access. This plan's discounts apply to Price Cap and Pricing Flexibility rates, but not to UNE rates.

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State

SBC SWBT Arkansas

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex To Price Can.	OPP % Difference Pricing Flex To Price Can.	UNE rate
DS1	\$577	\$265	\$588	\$368	2%	39%	\$258
DS3	\$5,525	\$2,600	\$5,625	\$2,850	2%	10%	Loop N/A
DS-0 Digital	\$163	\$106	\$198	\$144	21%	36%	\$106
DS-0 Analog	\$82	\$63	\$108	\$81	33%	29%	\$106
OC-3	\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48	\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192	\$100,125	\$58,500	\$100,125	\$58,500	0%	0%	N/A

SBC SWBT Kansas

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex To Price Can.	OPP % Difference Pricing Flex To Price Can.	UNE rate
DS1	\$577	\$265	\$588	\$368	2%	39%	\$258
DS3	\$5,525	\$2,600	\$5,625	\$2,850	2%	10%	Loop & Mi N/A
DS-0 Digital	\$163	\$106	\$198	\$144	21%	36%	\$106
DS-0 Analog	\$82	\$63	\$108	\$81	33%	29%	\$106
OC-3	\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48	\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192	\$100,125	\$58,500	\$100,125	\$58,500	0%	0%	N/A

SBC SWBT Missouri

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex To Price Can.	OPP % Difference Pricing Flex To Price Can.	UNE rate
DS1	\$577	\$265	\$588	\$368	2%	37%	\$294
DS3	\$5,525	\$2,600	\$5,625	\$2,850	2%	10%	Loop & Mi N/A
DS-0 Digital	\$163	\$106	\$198	\$144	21%	36%	\$58
DS-0 Analog	\$82	\$63	\$108	\$81	33%	29%	\$58
OC-3	\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48	\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192	\$100,125	\$58,500	\$100,125	\$58,500	0%	0%	N/A

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

ILEC	Company	State	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Cap.	OPP % Difference Pricing Flex to Price Cap.	UNE rate
DS1	SBC-SWBT	Oklahoma	\$577	\$265	\$388	\$368	2%	39%	\$437
DS3			\$5,525	\$2,600	\$5,625	\$2,850	2%	10%	Loop N/A
DS-0 Digital			\$163	\$106	\$198	\$144	21%	36%	\$134
DS-0 Analog			\$82	\$63	\$108	\$81	33%	29%	\$134
OC-3			\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	SBC-SWBT	Texas	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48			\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192			\$100,125	\$58,500	\$100,125	\$58,500	0%	0%	N/A
DS1	SBC-SWBT	Texas	\$577	\$265	\$577	\$360	0%	36%	\$245
DS3			\$5,525	\$2,600	\$5,625	\$2,850	2%	10%	Loop & MI N/A
DS-0 Digital			\$163	\$106	\$198	\$144	21%	36%	\$54
DS-0 Analog			\$82	\$63	\$108	\$81	33%	29%	\$54
OC-3			\$9,600	\$5,686	\$9,600	\$5,686	0%	0%	N/A
OC-12	SBC-SWBT	Texas	\$18,100	\$10,450	\$18,100	\$10,450	0%	0%	N/A
OC-48			\$35,875	\$20,700	\$35,875	\$20,700	0%	0%	N/A
OC-192			\$100,125	\$58,500	\$100,125	\$58,500	0%	0%	N/A

1 OC-n not offered at month-to-month rates, used 1-year term plan for Tariff pricing

2 Did not include the MYP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates, but not to UNE rates.

1/18/2003

Comparison of costs (10-mile Standalone Circuit)

Company State
Verizon: Bell Atlantic- North Maine

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$801	\$521	\$915	\$595	14%	14%	\$291
DS3	\$5,456	\$3,547	\$5,764	\$3,547	6%	0%	\$2,195
DS-0 Digital	\$209	\$167	\$274	\$219	31%	31%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company State
Verizon: Bell Atlantic- North New Hampshire

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$801	\$521	\$915	\$595	14%	14%	\$339
DS3	\$5,456	\$3,547	\$5,764	\$3,547	6%	0%	\$1,950
DS-0 Digital	\$209	\$167	\$274	\$219	31%	31%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company State
Verizon: Bell Atlantic- North Vermont

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Pricing Flex to Price Can.	OPP % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$801	\$521	\$915	\$595	14%	14%	\$185
DS3	\$5,456	\$3,547	\$5,764	\$3,547	6%	0%	\$2,051
DS-0 Digital	\$209	\$167	\$274	\$219	31%	31%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap.	OPP % Difference Pricing Flex to Price Cap.	UNE rate
DS1	\$729	\$474	\$780	\$507	7%	7%	\$286
DS3	\$5,176	\$3,365	\$5,456	\$3,365	5%	0%	\$2,796
DS-0 Digital	\$209	\$167	\$274	\$219	31%	31%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company

Verizon

Bell Atlantic

North

State

Massachusetts

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap.	OPP % Difference Pricing Flex to Price Cap.	UNE rate
DS1	\$801	\$521	\$915	\$595	14%	14%	\$435
DS3	\$5,456	\$3,547	\$5,764	\$3,547	6%	0%	\$2,464
DS-0 Digital	\$209	\$167	\$274	\$219	31%	31%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company

Verizon

Bell Atlantic

North

State

Rhode Island

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap.	OPP % Difference Pricing Flex to Price Cap.	UNE rate
DS1	\$671	\$436	\$716	\$466	7%	7%	\$241
DS3	\$5,176	\$3,365	\$5,456	\$3,365	5%	0%	\$2,467
DS-0 Digital	\$209	\$167	\$266	\$212	27%	27%	Mileage N/A
DS-0 Analog	\$182	\$146	\$241	\$193	32%	32%	Mileage N/A
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$47,095	N/A	N/A	N/A	N/A	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company

Verizon

Bell Atlantic

North

State

New York

Notes:

1 DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value - near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

2 DS0-Digital, used Digital II prices.

3 Did not include Pricing Flexibility contracts that require a committed level of access expense.

1/18/2003

Comparison of costs (10-mile Standalone Circuit)

Company State
Verizon: Delaware
Bell Atlantic-
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Can.	Opp % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$279
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	Loop N/A
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$48
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$48
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Verizon: New Jersey
Bell Atlantic-
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Can.	Opp % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$170
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	\$1,957
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$56
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$56
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Verizon: Pennsylvania
Bell Atlantic-
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Can.	Opp % Difference Pricing Flex to Price Can.	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$277
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	\$2,490
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$50
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$50
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

1/16/2003

Comparison of costs (10-mile Standalone Circuit)

Company State
Verizon: Bell Atlantic- Maryland
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$260
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	Loop N/A
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$58
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$58
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company State
Verizon: Bell Atlantic- Virginia
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$256
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	Loop N/A
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$54
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$54
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Company State
Verizon: Bell Atlantic- DC
South

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Price Cap	OPP % Difference Pricing Flex to Price Cap	UNE rate
DS1	\$657	\$405	\$780	\$469	19%	16%	\$596
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	Loop N/A
DS-0 Digital	\$320	\$173	\$409	\$222	28%	28%	\$78
DS-0 Analog	\$109	\$93	\$148	\$125	37%	35%	\$78
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

1/16/2003

Company State
 Verizon: West Virginia
 Bell Atlantic-
 South

Comparison of costs (10-mile Standalone Circuit)

ILEC	ILEC Tariff	ILEC OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex Opp	Mo-to-Mo % Difference Pricing Flex to Base Can.	OPP % Difference Pricing Flex to Base Can.	UNE rate
DS1	\$657	\$405	\$780	\$409	19%	16%	\$275
DS3	\$5,176	\$3,365	\$6,767	\$3,979	31%	18%	Loop N/A
DS-O Digital	\$320	\$173	\$409	\$222	28%	28%	\$50
DS-O Analog	\$109	\$93	\$148	\$125	37%	35%	\$50
OC-3	\$15,618	\$9,575	\$16,439	\$10,080	5%	5%	N/A
OC-12	\$35,340	\$16,155	\$37,200	\$17,000	5%	5%	N/A
OC-48	\$62,390	\$31,500	\$62,390	\$31,500	0%	0%	N/A
OC-192	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

1 DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value, near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

2 Did not include Pricing Flexibility contracts that require a committed level of access expense.